

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF WISCONSIN**

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NIKI ROBINSON and PATRICK TOMLINSON,

Plaintiffs,

v.

Case No. 24-CV-00264

CITY OF MILWAUKEE, et al.,

Defendants.

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**DEFENDANTS' MOTION FOR SUMMARY JUDGMENT AND RESPONSE  
TO PLAINTIFFS' MOTION FOR PARTIAL SUMMARY JUDGMENT**

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NOW COME the Defendants, City of Milwaukee, Lyndon Evans, Joseph Scheuring, Christian Garrido, Bradley Orlando, Nicole Plevak, Lorenzo Hernandez, Dexter Lee, Andrew Dudley, Kelton McCowan, Matthew Helwer, Jason Warwick, Gregory Rupnik, Paul Terriquez, Kevin Becker, Devon Williams, Shawn Switzer, Fidah Mustafa, Nathaniel Petersen, Sean Carleton, and Patrick Tivnan, by and through their attorney, Evan C. Goyke, City Attorney, by William K. Hotchkiss, Assistant City Attorney, who hereby move the Court for an order granting Defendants' Motion for Summary Judgment and dismissing all claims.

**Defendants' Motion for Summary Judgment and Response  
to Plaintiffs' Motion for Partial Summary Judgment.**

This motion is made pursuant to Federal Rule of Civil Procedure 56, Civil Local Rule 7, and is brought upon the grounds that the undisputed facts demonstrate that the Defendants did not violate the Plaintiffs' constitutional rights, or alternatively, that the Defendants are entitled to qualified immunity and all claims should be dismissed as a matter of law. Further, pursuant to the Court's Text Only Order on January 28, 2025, this motion and response to Plaintiffs' motion

is filed together in one document pursuant to the briefing schedule in the parties' joint executive summary. ECF No. 39. This motion is supported by:

1. Memorandum of Law in Support of Defendants' Motion and in Response to Plaintiffs' Motion;

Dated and signed at Milwaukee, Wisconsin this 7<sup>th</sup> day of July, 2025.

EVAN C. GOYKE  
City Attorney

*s/William K. Hotchkiss*  
WILLIAM K. HOTCHKISS  
Assistant City Attorney  
State Bar No. 1112878  
*Attorneys for Defendants*

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